

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION

CONSTRUCTION MATERIALS, )  
LTD, INC. )  
 )  
 Plaintiff, )  
 )  
 v ) CV-02-RRA-1155-NE  
 )  
 Equal Employment Opportunity )  
 Commission ("EEOC") )  
 )  
 Defendant. )

**PLAINTIFF'S DISCOVERY TO DEFENDANT  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

Now comes the Plaintiff Construction Materials, Ltd. Inc., pursuant to the specific allowance of the Court through its Order of November 9, 2005, who requests that the Defendant respond to the following interrogatories in accordance with Federal Rules of Civil Procedure 26 and 34:

**PLAINTIFF'S REQUEST FOR PRODUCE OF DOCUMENTS**

For the purpose of this discovery, the term "respondent" refers to the person or entity named in an EEOC charge by a charging party filing an EEOC charge.

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff requests that the Defendant furnish the following documents and things for the time period from January 1, 1999, to October 31, 2005:

1. Each and every document in which a Respondent named in

an EEOC charge has requested, directly or indirectly, documents from Defendant under the Freedom of Information Act,

2. Each and every response of Defendant to each such document produced in response to Production Request No. 1 above.

3. All reports of compliance/non-compliance with the requirements of the Freedom of Information Act made by Defendant to any governmental agency, including but not limited to internal, non-public reports to Defendant's national EEOC offices, reports to Congress and/or to any member or committee of Congress and/or to any other governmental agency other than EEOC.

4. Produce every memorandum, letter, e-mail or other document which provides EEOC personnel with direction on making appropriate and timely response to FOIA requests.

Submitted by,

Susan Williams Reeves  
Susan Williams Reeves  
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Ed Ragland.

Date: November 16, 2005

Susan Williams Reeves  
OF COUNSEL